



NATIONAL PARK SERVICE ENVIROFACTS

3/3/99

National Park Service
Hazardous Waste Management &
Pollution Prevention Team
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ENVIRONMENTAL TRAINING

DEFINITIONS

Contingency Plan: Required by the Resource Conservation and Recovery Act (RCRA) for all large quantity hazardous waste generators.

Emergency Response Plan: Required where park personnel perform hazardous waste emergency response (ER) operations.

Emergency Action Plan: Required where park personnel evacuate the premises during emergency but do not perform emergency response operations.

Incidental Releases: Releases of known hazardous substances that can be controlled at the time of release by personnel in the immediate release area; not considered an "emergency response" operation covered by the Hazardous Waste Operations Emergency Response (HAZWOPER) standard at 29 CFR 1910.120.

APPLICABLE STANDARDS

Federal: Environmental Protection Agency (EPA) regulations 40 CFR 112, 262.34, 265.16, 265 Subpart C, and 265 Subpart D. Occupational Safety and Health Administration (OSHA) regulations 29 CFR 1910.120 and 1910.1200. Department of Transportation (DOT) regulation 49 CFR 173.

State: Most states have adopted preparedness and prevention regulations identical or similar to the federal RCRA and OSHA regulations. However, state RCRA regulations can be more stringent than federal and should be reviewed.

Other: Local regulations concerning ER action requirements, such as coordination with local ER agencies, should be reviewed.

OSHA HAZARD COMMUNICATION (HAZCOM) TRAINING

The OSHA regulations at 29 CFR 1910.1200 requires all employers to provide Hazard Communication (HAZCOM) training to their personnel where hazardous chemicals are handled. The HAZCOM standard requires the preparation of a written hazard communication program that addresses personnel training. Personnel training must cover release detection, physical and health hazards, protective measures, material labeling and Material Safety Data Sheet (MSDS) information for hazardous chemicals to be

encountered during normal or emergency conditions. All personnel are required to undergo training upon employment and when a new chemical or hazard is introduced. Parks should perform HAZCOM refresher training at least annually.

OSHA HAZWOPER TRAINING

The OSHA regulations at 29 CFR 1910.120 require parks to prepare and implement an Emergency Response (ER) plan if the park intends to perform emergency response actions for hazardous materials releases. One key element of ER Plan implementation is the provision of training for personnel involved in ER activities. The three different levels of training outlined in this regulation include:



First Responder Awareness Level (Level I) -

All personnel who are likely to witness or discover a hazardous substance release and whose actions would be limited to initiating an emergency response sequence by notifying the proper authorities. The training requirement is 4 to 8 hours.

First Responder Operations Level (Level II) -

All personnel who respond to releases or potential releases of hazardous substances as part of the initial response for the purpose of protecting nearby persons, property, or the environment from the effects of the release. Actions are limited to defensive measures to stop the release. The training requirement is 24 hours.

Hazardous Materials Technician (Level III) -

All personnel who respond for the purpose of stopping the release in a more aggressive way, such as by plugging or patching containers. The personnel can also participate in the cleanup of released materials. The training requirement is 40 hours.

All of the above training must be performed by a trainer that has completed a teacher-training course or shall otherwise demonstrate that they have the training or credentials necessary to ensure competence. Level II requires an 8-hour annual refresher session to ensure skills and knowledge are maintained.

In lieu of the ER Plan, parks that elect not to perform hazardous materials ER response can prepare and implement an Emergency Action Plan in accordance with 29 CFR 1910.38. All personnel must be trained on evacuation procedures in the event of an emergency.

RCRA CONTINGENCY TRAINING

All RCRA large quantity generator (LQGs) parks are required to comply with the Preparedness and Prevention (Subpart C) and Contingency Plan and Emergency Procedures (Subpart D) requirements in 40 CFR 265. Section 40 CFR 265.16 requires that park personnel complete a classroom instruction or on-the-job training on hazardous waste management. The training program must be directed by an individual who is trained in hazardous waste management procedures. At a minimum, the training must ensure that park personnel can respond effectively to hazardous waste emergencies. An annual review of the initial training is required.

Small Quantity Generators (SQGs) should also have training in hazardous waste management.

DOT HAZARDOUS MATERIALS TRAINING

DOT regulations (49 CFR 173.1) require all parks involved in the transportation of hazardous materials or the offering of hazardous materials for disposal to perform personnel training as outlined in the regulations. These requirements address proper hazardous materials packaging and labeling.

OIL POLLUTION PREVENTION TRAINING

Personnel at parks that store petroleum in quantities exceeding the thresholds outlined in 40 CFR 112 are required to be periodically instructed in the operation and maintenance of equipment to prevent discharges of oil. Training requirements must be identified in the park Spill Control and Countermeasures (SPCC) Plan.

ENVIROFACTS X-REFERENCES

- Hazard Communication
- Spill Response and Reporting
- Spill Prevention Planning

ENVIRONMENTAL AND HEALTH & SAFETY TRAINING REQUIREMENTS MATRIX

TOPIC	TRAINING REQUIREMENT					
	RCRA LQs	RCRA SQs*	DOT	OSHA HAZCOM	OSHA HAZWOPER	SPCC
Who is affected?	Parks generating > 1,000kg/month of hazardous waste	Parks that generate 100 to 1,000 kg/month of hazardous waste	Parks involved in the transportation, shipment, or preparation for shipment of hazardous materials	Parks that handle hazardous chemicals	Parks that may be involved in an emergency response operation involving the release of a hazardous substance	Parks storing quantities of petroleum greater than those specified in regulations
Who must be trained?	Personnel who handle hazardous waste	Personnel who handle hazardous waste	Personnel involved in the transportation or shipment of hazardous materials	Personnel who may be exposed to hazardous substances under normal operating conditions or in foreseeable emergencies	Personnel who participate or may be expected to participate in emergency response; training based on level of involvement	Personnel involved in the operation and maintenance of equipment that may discharge oil
When must training occur?	Within 6 months of employment of new job assignment Annual refresher for all personnel	Not specified	Not specified Refresher every three years	At time of initial assignment. Additional when a new hazard is introduced to the work area. Annual refresher recommended but not required.	Initial training prior to taking part in emergency response Annual refresher	Spill prevention training must be conducted at intervals frequent enough to assure adequate understanding of SPCC Plan
What are recordkeeping requirements?	Written job title and description; written training description; documentation of training	Not required, however, description and documentation of training is recommended	Not required, however, description and documentation of training is recommended	Written description of personnel information and training must be included in HAZCOM program	Must certify training or competency	Not required, however, description and documentation of training is recommended
Regulatory citation	40 CFR 262.34(a)(4) 40 CFR 265.16	40 CFR 262.34(a)(5)	49 CFR 173.1(b) 49 CFR 177.800(a) 49 CFR 177.816	29 CFR 1910.1200(h)	29 CFR 1910.120(a)(5) & (6) 29 CFR 1910.120(p)(7) & (8)	40 CFR 112.7(e)(10)

* It is recommended that CESQG's meet SQG requirements.